

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

ARC CONTROLS, INC.,	)	
Plaintiff,	)	
	)	
v.	)	
	)	CASE NO. 1:19-cv-391-LG-RPM
	)	
M/V NOR GOLIATH, <i>in rem</i> , and	)	<i>Consolidated with:</i>
GOLIATH OFFSHORE HOLDINGS PTE.	)	CASE NO. 1:19-cv-395-LG-RPM
LTD., <i>in personam</i>	)	
_____	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

COME NOW Defendants, M/V NOR GOLIATH, *in rem*, and Goliath Offshore Holdings Pte. Ltd., *in personam* (collectively “Goliath”), and respectfully request leave of this Court to extend the deadline for filing their response to McAllister Towing of New York, LLC’s Motion for Summary Judgment (Doc. 437). The current deadline for submitting any response is March 1, 2021. Goliath requests an additional four days to do so; the new deadline would be March 5, 2021 if this motion is granted.

Counsel for Goliath has conferred with counsel for McAllister and has confirmed that McAllister is not opposed to this request.

**WHEREFORE**, for the reasons stated above Goliath respectfully requests that this Honorable Court extend the deadline for filing their response to March 5, 2021.

Done this the 1st day of March, 2021.

Respectfully submitted:

/s/Miles P. Clements

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Counsel for Defendants M/V NOR GOLIATH, *in rem*, and Goliath Offshore Holdings Pte. Ltd., *in personam*

**Certificate of Service**

I HEREBY CERTIFY that, on the 1st day of March, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, that service was accomplished through the Notice of Electronic Filing on Filing Users, and that service was accomplished on any party or counsel who is not a Filing User by other means in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court.

/s/Miles P. Clements